

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2000

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation Into PURPA
Implementation.

SUPPLEMENTAL COMMENTS OF
THE NORTHWEST AND
INTERMOUNTAIN POWER
PRODUCERS COALITION, THE
RENEWABLE ENERGY
COALITION, AND THE
COMMUNITY RENEWABLE
ENERGY ASSOCIATION
FOLLOWING FIRST WORKSHOP

I. INTRODUCTION

The Northwest and Intermountain Power Producers Coalition (“NIPPC”), the Renewable Energy Coalition (the “Coalition”), and the Community Renewable Energy Association (“CREA,” and collectively with NIPPC and the Coalition, the “QF Trade Associations”) appreciate the opportunity to comment on the scope of this proceeding. The responses below respond to the first workshop in this process held on April 5, 2019 and provide additional responses to Staff’s Initial Questions (“Staff’s Questions”).

The QF Trade Associations appreciate Staff’s efforts to define the scope of this proceeding and capture all issues by providing the parties with additional time to respond. Following the first workshop, Staff provided a near-comprehensive list of issues identified by stakeholders and categorized into four groups: 1) avoided costs; 2) contracts; 3) interconnection; and 4) planning. While these general categories are helpful, the QF Trade Associations emphasize that “process” is an important aspect at all

stages, both at the qualifying facility's ("QF's") point of contact with the utilities and the process that occurs before the Oregon Public Utility Commission ("Commission").

Additionally, there needs to be a fifth category for transmission issues.

Transmission issues often become looped in with interconnection, but that is often a result of not fully understanding difference. In light of the Commission's recent efforts to better understand transmission issues, the UM 2000 process should parse out transmission as a separate area for consideration. Finally, it is important to understand that none of these artificial categories operate within a vacuum. A change in one area affects other aspects of Public Utility Regulatory Policies Act ("PURPA") implementation and affects the broader financeability and viability of QF projects.

II. FAST TRACK ITEMS

Items for consideration on a fast track should focus on issues with a high potential to reduce disputes, issues that are ripe for resolution, and data collection that will inform the long-term policy docket.

A. Capacity Value of Existing QFs

The capacity value of existing QFs is ripe for resolution. Existing QFs provide capacity value to the utilities and should continue to be paid for that value when they renew their power purchase agreements commencing with the first day of the new project. This issue is relatively simple and can be parsed out from the remainder of the PURPA issues. It has been developed over the course of the last several years and PacifiCorp is already required to take steps towards addressing this issue as a follow-on to its 2017 Integrated Resource Plan ("IRP").

The QF Trade Associations raised this issue in multiple prior proceedings and despite Commission rulings in their favor, the utilities have failed to implement any changes. In UM 1610, the Commission agreed “that a certain amount of capacity may not be valued if utilities assume in their IRPs that existing QFs nearing contract expiration will automatically renew.”¹ This was in response to the QFs’ assertions that “[t]he utilities plan in their IRPs on existing QFs to renew their contracts, thereby allowing deferral of capacity investments, yet QFs are not compensated for the capacity value associated with the deferral and are effectively providing it for free.”² The Commission then directed each utility to work with stakeholders to address this issue in its next IRP.³

In PacifiCorp’s next IRP, it asserted that it complied with the Commission’s order “by *not* assuming QFs will renew.”⁴ PacifiCorp then assumed that *no* QFs would renew their contracts. PacifiCorp changed its assumptions not based on any new information, but in order to avoid conducting any analysis or paying QFs for the value associated with those that renew their contracts.

The Commission acknowledged that “non-renewal may not be the best planning assumption when many (or most) QFs do, in fact, renew.”⁵ The Commission then, directed “PacifiCorp, Staff, and parties to discuss a potential study of the capacity value

¹ *In re Investigation into Qualifying Facility Contracting and Pricing*, Docket No. UM 1610, Order No. 16-174 at 19 (May 13, 2016).

² *Id.*

³ *Id.*

⁴ *In re Pacificorp 2017 Integrated Resource Plan*, Docket No. LC 67, Order No. 18-138 (Apr. 27, 2018) (emphasis added).

⁵ *Id.*

of renewing QFs, and Staff shall bring this issue to a public meeting before the 2017 IRP Update.”⁶ The parties began working together in August through October of 2018. On October 22, 2018, the QF Trade Associations sent PacifiCorp an email with their recommendations. (Attached hereto as Attachment A). That is where this issue has been left.

Therefore, because this issue has been before the Commission since at least 2014 (Phase I of UM 1610) and a lot of work has already gone into this issue, it is appropriate for resolution on a fast track.

B. Interconnection

Resolving interconnection issues on a fast track has a high potential to reduce disputes. The interconnection process is a substantial contributing cause to PacifiCorp’s successful efforts to end PURPA in its service territory and is the new battle ground in which Portland General Electric Company’s (“PGE”) actions are having the practical impact of projects being unable to operate. There are a number of PGE and QF complaints on interconnection matters already, and there will likely be a significantly greater number, if the Commission does not take prompt action on this front.

Improvements to the interconnection process will increase the certainty and predictability of QF development in Oregon, as well as easing concerns about utility obstruction and lessening the tensions between utilities and QFs. Interconnection has not been evaluated since the AR 521 rulemaking in 2008, while various other aspects of PURPA implementation have been evaluated in numerous proceedings more recently.

⁶ *Id.* at Appendix A at 22.

The industry has changed dramatically since AR 521, all industry participants agree to some extent that the rules are outdated, and there have been lessons learned that could dramatically improve the process. In addition, the community solar program is likely to use similar if not the same interconnection process. As such, the industry will get the most bang for its buck, by fast-tracking interconnection issues.

The following broad categories of interconnection issues encompass many from Staff's list and should be considered in the fast track:

- Immediately enforcing current rights for QFs to retain third party contractors approved by the utility perform studies, order equipment and construct interconnection facilities to be owned by the utility and requiring utilities to provide adequate system data for third parties;
- Improving transparency, communication, access to in-person meetings with engineers, access to standards and assumptions, study inputs, baseline data, and price assumptions;
- Allowing prompt resolution of disputes between the utility and interconnection customer;
- Eliminating the utility's ability to hold up the process and imposing concrete and enforceable timelines;
- Consideration of interconnection options, i.e., transmission versus distribution, various routes, other options;
- Consideration of alternative means of meeting functional requirements;
- Providing appropriate process and remedies for utility violations of the rules (e.g., providing extension of commercial operation date for delays);
- Providing appropriate checks on the utility's work to ensure they are not gold-plating or imposing unreasonable requirements;
- Providing appropriate mechanism for cost sharing or reimbursement; and
- Addressing the issue regarding QFs being required to take network resource interconnection service under the QF-specific interconnection

tariff to be eligible for power purchase agreements (“PPAs”), but simultaneously being denied refunds for network upgrades.

C. Contracting Issues

There are a number of issues related to the process in which a QF can obtain a contract and disputes over contract terms, that if resolved on the fast track also have a high potential of reducing disputes. The QF Trade Associations do not list all of those now, but note a few here:

- Clarifying and the standard contract negotiation process and making this process more reasonable (number of days to respond, contract draft stages, length of time when minor vs. major changes to the PPA are requested, what constitutes a minor or major change, remedies for utility errors/mistakes, ability of developer to fill in the blanks, etc.);
- Providing certainty to QFs in the contracting queue when an avoided cost update is filed (e.g., provide a minimum time window on the effective date or other relief);
- Providing a better contracting process for non-standard contract negotiation; and
- Providing more expedited dispute resolution.

The above issues have been the subject of a number of QF-utility complaints and as such, the QF Trade Associates recommend that these contracting issues be addressed on a more expedited track.

D. Collecting Key Data

The fast track should also include a process to collect key data to inform the remainder of this docket. This data should include metrics on three areas within the PURPA implementation: 1) utility avoided cost data; 2) the QF PPA contracting process; and 3) the interconnection process. There have been a number of claims about these processes and methodologies being ineffective or broken and assertions about how to

change those processes and methodologies to reach a better outcome. However, in order to determine the truth of those claims or the extent of the problem, the stakeholders should engage in a data gathering and disclosure process. The data should be shared with all stakeholders so that it can appropriately be reviewed and analyzed to determine whether changes are needed and what types of changes would address the real issues.

E. Storage

Storage is another issue that is imperative for resolution on a fast track because it is ripe for development in Oregon and if it is not addressed quickly, there is potential for a number of disputes regarding how it should be treated. Storage should be addressed both for stand-alone storage facilities and storage co-located with other resources. This issue covers all categories including:

- Avoided costs prices;
- PPA eligibility, terms and conditions (including upgrades to existing facilities after PPA execution); and
- Interconnection issues.

F. PacifiCorp's Avoided Cost Prices

PacifiCorp's avoided cost prices are not accurate. There are a number of issues regarding PacifiCorp's avoided cost prices that the QF Trade Associations previously raised in a number of proceedings and have not been addressed. These issues impact both new and existing projects. PacifiCorp's Oregon service territory is listed as closed for new business, and PacifiCorp has won the PURPA wars in Oregon. PacifiCorp has only had one new project, the 200 kW Three Sisters irrigation district. There are many existing projects that have been selling power to PacifiCorp for years and are a valuable

part of PacifiCorp’s resource stack, which have contracts that are renewing soon. These primarily are small scale hydro and biomass. The Commission needs to promptly address PacifiCorp’s artificially low rates to ensure that these projects can continue to operate.

PacifiCorp has obtained low rates by, among others:

- Acquiring resources “outside” of its IRP on a near continual basis;
- Excluding transmission from the avoided cost rate;
- Failing to pay for capacity;
- Failing to interconnect QF projects due to its potentially imaginary “load pocket” issue.

III. ADDITIONAL ISSUES

The below lists additional issues for consideration that were not identified in staff’s initial question list or in the first workshop.

1. Establish a process for utilities and stakeholders to request changes to the standard-offer contracts and tariffs containing PPA requirements that provides adequate notice and response periods, adequate time to complete revisions before the next avoided cost price change, explanation of and reason for each proposed change, and the opportunity to propose changes every three years with ability to waive by Commission. This process would not allow massive or significant policy changes that have impacts on other key elements of PURPA implementation like the ones PGE requested in UM 1987, but allow it to occur on a more regular schedule with ordinary contract and tariff improvements and without upsetting the industry expectations. An expedited process would be allowed to implement changes needed to account for contemporary OPUC or court orders or cases. (Category: Contracts – Process).
2. Address interconnection operations and maintenance (“O&M”) reimbursements to the utility-owned interconnection facilities paid for by the QF. Determine basis or calculation of such reimbursements, how and when such reimbursements are paid, process to account for changes to basis for reimbursement, whether all utilities should require actual costs of

O&M as basis for O&M reimbursement assessed. (Category: Interconnection – costs)

3. Establish alternative term length provisions that will save ratepayer dollars through term extensions or levelized prices. (Category: Contract – Provisions).
4. Address the issue of non-standard PPA forms, agreements, and settlement agreements being considered confidential. While Staff lists issues regarding understanding how non-standard avoided cost prices are set, and “all aspects” of non-standard PPAs, it is important to highlight these specific issues around confidentiality. There are a number of other specific issues regarding non-standard PPAs that we expect are included within Staff’s broad categories. (Category: Contracts – Other).
5. Address the issue regarding what changes to the facility constitute a material change that would require the QF to restart the interconnection process and/or request a new PPA and the right to upgrade after PPA execution. (Categories: Contract – Process; Interconnection: Process).

IV. PRIORITY ISSUES

It is our understanding that the Commission does not intend to completely reinvent Oregon’s implementation of PURPA in this investigation. Therefore, while virtually every aspect of PURPA has been identified as a possible “issue,” we expect that there will be additional process and opportunity in the next round of comments to provide input on the scope of issues for the remainder of this proceeding (after the fast track) including the schedule for this investigation. This approach outlined above is meant to provide a big picture and we ask and anticipate that this process will have some level of flexibility to more narrowly define the scope and/or to supplement closely related issues to the ones already identified.

We look forward to reviewing Staff’s final compilation of issues, and intend to identify and prioritize in our next round of comments.

Dated this 26th day of April 2019.

Respectfully submitted,



Irion A. Sanger
Marie P. Barlow
Sanger Thompson, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com
marie@sanger-law.com

Of Attorneys for Northwest and Intermountain
Power Producers Coalition and the Renewable
Energy Coalition

RICHARDSON ADAMS, PLLC



Gregory M. Adams
OSB No. 101779
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
greg@richardsonadams.com

Of Attorneys for the Community Renewable
Energy Association

Attachment A

to

**Supplemental Comments of NIPPC, The Coalition, and CREA
Following First Workshop**

From: Irion Sanger irion@sanger-law.com

Subject: Re: PacifiCorp IRP - Capacity Value of Renewing QFs Planning Call - Follow-Up

Date: October 22, 2018 at 8:54 AM

To: Siores, Natasha Natasha.Siores@pacificorp.com

Cc: ANDRUS Brittany brittany.andrus@state.or.us, ana.boyd@sierraclub.org, Jenks, Bob (Oregon CUB) bob@oregoncub.org, brmullins@mwanalytics.com, MOORE Caroline caroline.f.moore@state.or.us, cesia.kearns@sierraclub.org, denise.saunders@pgn.com, docket@oregoncub.org, docket@renewablenw.org, esteb44@centurylink.net, Lockey, Etta Etta.Lockey@pacificorp.com, fjackson.stoddard@morganlewis.com, franco.albi@pgn.com, fred@nwenergy.org, gloria.smith@sierraclub.org, SIERMAN Jason * ODOE Jason.Sierman@state.or.us, johanna.riemenschneider@doj.state.or.us Johanna.RIEMENSCHNEIDER@state.or.us, jravenesanmarcos@yahoo.com, McVee, Matthew Matthew.McVee@pacificorp.com, michael@renewablenw.org, mike@oregoncub.org, nathan.sandvig@nationalgrid.com, Oregon Dockets OregonDockets@PacifiCorp.com, patrick.g.rowe@doj.state.or.us Patrick.G.ROWE@state.or.us, patrick.hager@pgn.com, pge.opuc.filings@pgn.com, proctereconomics@gmail.com, rkahn@nipcc.org, silvia@renewablenw.org, sknudsen@nipcc.org, sommer.moser@doj.state.or.us Sommer.MOSER@state.or.us, tcp@dvclaw.com, wendy.simons@oregon.gov, wendy@nwenergy.org, Ralston, Jessica Jessica.Ralston@PacifiCorp.com, LaBray, Shayleah Shayleah.LaBray@pacificorp.com, MacNeil, Daniel Daniel.MacNeil@pacificorp.com, Olson, Katherine Katherine.Olson@pacificorp.com, Marie Barlow marie@sanger-law.com, Mark Thompson mark@sanger-law.com

Natasha

Thanks for your patience.

We recommend the assignment be redrafted as:

PacifiCorp will present the IRP initial load and resource balance (L&R) assuming that QFs renew their contracts at the end of their terms, consistent with past IRPs.

For the purpose of valuing QF capacity, PacifiCorp will prepare an alternative initial L&R that uses the planning assumption that QFs do not renew at the end of their contract term.

In UM 1610, Mr. Higgins argued that the assumption that small QFs are presumed to extend their contracts upon expiration *should not be used in determining the value of QF capacity*, because doing so resulted in a logical circularity. To cure this, Kevin argued that, *for the purpose of valuing QF capacity*, PacifiCorp should develop an Alternative IRP scenario that re-determined the preferred resource portfolio absent the (assumed) renewing QFs in order to properly value the capacity that QFs would avoid. This exercise would be performed solely for the purpose of valuing QF capacity and was not intended to be a methodology change for the IRP.

Kevin's argument in UM 1610 was directed to QF *pricing*, not to the IRP per se. That is, Kevin did not challenge the reasonableness of the assumption for *planning purposes* that small QFs would renew their contracts. Therefore, there is no reason to change the planning assumptions in the IRP in response to Kevin's recommendation.

Thanks

Irion Sanger

Sanger Law PC

1117 SE 53rd Ave

Portland, OR 97215

503-756-7533 (tel)

503-334-2235 (fax)
irion@sanger-law.com

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From: Irion Sanger <irion@sanger-law.com>
Date: Tuesday, October 16, 2018 at 7:39 AM
To: "Siores, Natasha" <Natasha.Siores@pacificcorp.com>
Cc: ANDRUS Brittany <brittany.andrus@state.or.us>, "ana.boyd@sierraclub.org" <ana.boyd@sierraclub.org>, Bob Jenks <bob@oregoncub.org>, "brmullins@mwanalytics.com" <brmullins@mwanalytics.com>, MOORE Caroline <caroline.f.moore@state.or.us>, "cesia.kearns@sierraclub.org" <cesia.kearns@sierraclub.org>, "denise.saunders@pgn.com" <denise.saunders@pgn.com>, "dockets@oregoncub.org" <dockets@oregoncub.org>, "dockets@renewablenw.org" <dockets@renewablenw.org>, "esteb44@centurylink.net" <esteb44@centurylink.net>, "Lockey, Etta" <Etta.Lockey@pacificcorp.com>, "fjackson.stoddard@morganlewis.com" <fjackson.stoddard@morganlewis.com>, "franco.albi@pgn.com" <franco.albi@pgn.com>, Fred Heutte <fred@nwenergy.org>, "gloria.smith@sierraclub.org" <gloria.smith@sierraclub.org>, SIERMAN Jason * ODOE <Jason.Sierman@state.or.us>, Johanna Riemenschneider <Johanna.RIEMENSCHNEIDER@state.or.us>, John Lowe <jravenesanmarcos@yahoo.com>, "McVee, Matthew" <Matthew.McVee@pacificcorp.com>, "michael@renewablenw.org" <michael@renewablenw.org>, "mike@oregoncub.org" <mike@oregoncub.org>, "nathan.sandvig@nationalgrid.com" <nathan.sandvig@nationalgrid.com>, Oregon Dockets <OregonDockets@PacifiCorp.com>, "patrick.g.rowe@doj.state.or.us" <Patrick.G.ROWE@state.or.us>, "patrick.hager@pgn.com" <patrick.hager@pgn.com>, "pge.opuc.filings@pgn.com" <pge.opuc.filings@pgn.com>, "proctereconomics@gmail.com" <proctereconomics@gmail.com>, Robert Kahn <rkahn@nippc.org>, Sidney Villanueva <sidney@sanger-law.com>, "silvia@renewablenw.org" <silvia@renewablenw.org>, "sknudsen@nippc.org" <sknudsen@nippc.org>, "sommer.moser@doj.state.or.us" <Sommer.MOSER@state.or.us>, "tcp@dvclaw.com" <tcp@dvclaw.com>, "wendy.simons@oregon.gov" <wendy.simons@oregon.gov>, "wendy@nwenergy.org" <wendy@nwenergy.org>, "Ralston, Jessica" <Jessica.Ralston@PacifiCorp.com>, "LaBray, Shayleah" <Shayleah.LaBray@pacificcorp.com>, "MacNeil, Daniel" <Daniel.MacNeil@pacificcorp.com>, "Olson, Katherine" <Katherine.Olson@pacificcorp.com>
Subject: Re: PacifiCorp IRP - Capacity Value of Renewing QFs Planning Call - Follow-Up

Natasha

Sorry for the delay. We are still reviewing and will provide our suggestions (if any) by the end of the week.

Irion Sanger
 Sanger Law PC
[1117 SE 53rd Ave](#)
 Portland, OR 97215

[Portland, OR 97219](#)

[503-756-7533](tel:503-756-7533) (tel)

[503-334-2235](tel:503-334-2235) (fax)

irion@sanger-law.com

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On Oct 15, 2018, at 5:57 PM, Siores, Natasha <Natasha.Siores@pacificorp.com> wrote:

Thanks Brittany. Staff's were the only comments we received. Taking that into consideration we've revised our description as follows.

PacifiCorp will present the IRP initial load and resource balance (L&R) in two ways. The first initial L&R will use the planning assumption that QFs do not renew at the end of their contract term. For informational purposes, the second initial L&R will assume that all QFs renew through the end of the IRP study period.

In addition, the company will perform a sensitivity to assess portfolio expansion impacts and system costs. The first portfolio will use the planning assumption that QFs do not renew at the end of their contract term. For informational purposes, a comparative portfolio will assume that all QFs renew through the end of the IRP study period. In the comparative portfolio, renewal QF pricing is unknown and will be considered zero for modeling purposes.

Regards,
Natasha

-----Original Message-----

From: ANDRUS Brittany [<mailto:brittany.andrus@state.or.us>]

Sent: Tuesday, September 18, 2018 3:11 PM

To: ana.boyd@sierraclub.org; Jenks, Bob (Oregon CUB) <bob@oregoncub.org>; brmullins@mwanalytics.com; MOORE Caroline <caroline.f.moore@state.or.us>; cesia.kearns@sierraclub.org; denise.saunders@pgn.com; dockets@oregoncub.org; dockets@renewablenw.org; esteb44@centurylink.net; Lockey, Etta <Etta.Lockey@pacificorp.com>; fjackson.stoddard@morganlewis.com; franco.albi@pgn.com; fred@nwenergy.org; gloria.smith@sierraclub.org; irion@sanger-law.com; SIERMAN Jason * ODOE <Jason.Sierman@state.or.us>; johanna.riemenschneider@doj.state.or.us <Johanna.RIEMENSCHNEIDER@state.or.us>; jravenesanmarcos@yahoo.com; McVee, Matthew <Matthew.McVee@pacificorp.com>; michael@renewablenw.org; mike@oregoncub.org; Siores, Natasha <Natasha.Siores@pacificorp.com>; nathan.sandvig@nationalgrid.com; Oregon Dockets <OregonDockets@PacifiCorp.com>; patrick.g.rove@doj.state.or.us <Patrick.G.ROWE@state.or.us>; patrick.hager@pgn.com; pge.opuc.filings@pgn.com; proctereconomics@gmail.com; rkahn@nippc.org; sidney@sanger-law.com; silvia@renewablenw.org; sknudsen@nippc.org;

sommer.moser@doj.state.or.us <Sommer.MOSER@state.or.us>; tcp@dvclaw.com;
wendy.simons@oregon.gov; wendy@nwenergy.org
Cc: Ralston, Jessica <Jessica.Ralston@PacifiCorp.com>; LaBray, Shayleah
<Shayleah.LaBray@pacificorp.com>; MacNeil, Daniel
<Daniel.MacNeil@pacificorp.com>
Subject: [INTERNET] RE: PacifiCorp IRP - Capacity Value of Renewing QFs
Planning Call - Follow-Up

** STOP. THINK. External Email **

Hi, Natasha,

I view the proposed work below as the first step, as I believe it will provide MWs but not an associated financial value. I think we'll need to discuss ways to move that second part forward.

What do others think?

Thanks,

Brittany

From: Siores, Natasha [Natasha.Siores@pacificorp.com]
Sent: Tuesday, September 18, 2018 9:46 AM
To: dockets@oregoncub.org; Oregon Dockets; dockets@renewablenw.org;
franco.albi@pgn.com; ana.boyd@sierraclub.org; esteb44@centurylink.net;
wendy@nwenergy.org; mike@oregoncub.org; pge.opuc.filings@pgn.com;
patrick.hager@pgn.com; fred@nwenergy.org; Jenks, Bob (Oregon CUB);
rkahn@nippc.org; cesia.kearns@sierraclub.org; sknudsen@nippc.org; Lockett, Etta;
jravenesanmarcos@yahoo.com; McVee, Matthew; MOORE Caroline;
sommer.moser@doj.state.or.us; brmullins@mwanalytics.com;
michael@renewablenw.org; tcp@dvclaw.com; proctereconomics@gmail.com;
johanna.riemenschneider@doj.state.or.us; patrick.g.rowe@doj.state.or.us;
nathan.sandvig@nationalgrid.com; irion@sanger-law.com;
denise.saunders@pgn.com; SIERMAN Jason * ODOE; wendy.simons@oregon.gov;
gloria.smith@sierraclub.org; fjackson.stoddard@morganlewis.com;
silvia@renewablenw.org; sidney@sanger-law.com
Cc: Ralston, Jessica; LaBray, Shayleah; MacNeil, Daniel; MOORE Caroline;
ANDRUS Brittany
Subject: RE: PacifiCorp IRP - Capacity Value of Renewing QFs Planning Call -
Follow-Up

Hello all,

Following up from our call two weeks ago, here is the description of the work we propose to do to address the value of renewing QF issue from the IRP Order that we discussed on our call.

PacifiCorp will present the IRP initial load and resource balance (L&R) in two ways. The first initial L&R will use the planning assumption that QFs do not renew at the end of their contract term. For informational purposes, the second initial L&R will assume that all QFs renew through the end of the IRP study period.

Please let us know if there are questions or additional feedback on this. Thank you.

Regards,
Natasha

From: Siores, Natasha

Sent: Monday, August 27, 2018 8:42 AM

To: 'dockets@oregoncub.org' <dockets@oregoncub.org>; Oregon Dockets <OregonDockets@PacifiCorp.com>; 'dockets@renewablenw.org' <dockets@renewablenw.org>; 'franco.albi@pgn.com' <franco.albi@pgn.com>; 'ana.boyd@sierraclub.org' <ana.boyd@sierraclub.org>; 'esteb44@centurylink.net' <esteb44@centurylink.net>; 'wendy@nwenergy.org' <wendy@nwenergy.org>; 'mike@oregoncub.org' <mike@oregoncub.org>; 'pge.opuc.filings@pgn.com' <pge.opuc.filings@pgn.com>; 'patrick.hager@pgn.com' <patrick.hager@pgn.com>; 'fred@nwenergy.org' <fred@nwenergy.org>; 'Jenks, Bob {Oregon CUB}' (bob@oregoncub.org) <bob@oregoncub.org>; 'rkahn@nippc.org' <rkahn@nippc.org>; 'cesia.kearns@sierraclub.org' <cesia.kearns@sierraclub.org>; 'sknudsen@nippc.org' <sknudsen@nippc.org>; Lockey, Etta <Etta.Lockey@pacificorp.com>; 'jravenesanmarcos@yahoo.com' <jravenesanmarcos@yahoo.com>; McVee, Matthew <Matthew.McVee@pacificorp.com>; 'caroline.f.moore@state.or.us' <caroline.f.moore@state.or.us>; 'sommer.moser@doj.state.or.us' <sommer.moser@doj.state.or.us>; 'brmullins@mwanalytics.com' <brmullins@mwanalytics.com>; 'michael@renewablenw.org' <michael@renewablenw.org>; 'tcp@dvclaw.com' <tcp@dvclaw.com>; 'proctereconomics@gmail.com' <proctereconomics@gmail.com>; 'johanna.riemenschneider@doj.state.or.us' <johanna.riemenschneider@doj.state.or.us>; 'patrick.g.rowe@doj.state.or.us' <patrick.g.rowe@doj.state.or.us>; 'nathan.sandvig@nationalgrid.com' <nathan.sandvig@nationalgrid.com>; 'irion@sanger-law.com' <irion@sanger-law.com>; 'denise.saunders@pgn.com' <denise.saunders@pgn.com>; 'jason.sierman@state.or.us' <jason.sierman@state.or.us>; 'wendy.simons@oregon.gov' <wendy.simons@oregon.gov>; 'gloria.smith@sierraclub.org' <gloria.smith@sierraclub.org>; 'fjackson.stoddard@morganlewis.com' <fjackson.stoddard@morganlewis.com>; 'silvia@renewablenw.org' <silvia@renewablenw.org>; 'sidney@sanger-law.com' <sidney@sanger-law.com>

Cc: Ralston, Jessica <Jessica.Ralston@PacifiCorp.com>; LaBray, Shayleah <Shayleah.LaBray@pacificorp.com>; Daniel MacNeil (Daniel.MacNeil@pacificorp.com) <Daniel.MacNeil@pacificorp.com>; MOORE Caroline <caroline.f.moore@state.or.us>; Brittany Andrus (brittany.andrus@state.or.us) <brittany.andrus@state.or.us>

Subject: PacifiCorp IRP - Capacity Value of Renewing QFs Planning Call - to be held 9/4

Hello LC 67 Parties,

We've managed to find a new date for this call.

PacifiCorp, REC and OPUC Staff have scheduled a call on September 4, 2018, from 3:30pm to 4:30pm, to address the following issue from the 2017 IRP Order. Please see call in information below.

"PacifiCorp, Staff and parties should discuss a potential study of the capacity value of renewing QFs, and Staff shall bring this issue to a public meeting before the 2017 IRP Update." (Appendix A, p. 22)

We plan to use this initial call to discuss how to approach this issue and to develop a plan and/or next steps. Note that the 2017 IRP Order was issued just a few days before the 2017 IRP Update was filed, so there was not an opportunity to discuss this and bring it to a public meeting before the 2017 IRP Update.

Date/Time:

Tuesday, September 4, 2018 from 3:30pm to 4:30 pm

Call-in Information:

Join by phone

(503) 813-5252 or (855) 499-5252

Conference ID: 979416

Regards,
Natasha

Natasha Siores

Pacific Power Regulatory Affairs

1503-813-6583 office 1971-801-3369 cellular

lnatasha.siores@pacificorp.com<<mailto:lnatasha.siores@pacificorp.com>>

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